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September 22, 2025

EMAIL ONLY

Kelsey H. Saalman, Esquire
Cooper Klaasmeyer, Esquire
Morgan & Morgan
4401 Belle Oaks Dr., Ste 300
North Charleston, South Carolina 29405

Re: John Panico and Patricia Panico v. Joshua Marro
US District Court Civil Action No.: 2:25-cv-03181
Our File No.: 450-010

Dear Kelsey and Cooper:

I am writing to follow up on my correspondence of June 10, 2025, serving Defendant's First Set of Interrogatories and First Set of Requests for Production of Documents. I wrote again on August 8, 2025. To date, I do not have any responses to these, and they are quite overdue. Please get them to me as soon as possible or I will be forced to file a Motion to Compel, which is a waste of time for everyone since I am entitled to the documents. In any event, this letter serves as a Rule 11 notice regarding discovery.

Once I get discovery, I need to get dates to take the depositions of your clients and a place to depose them.

I look forward to hearing from you.

Sincerely,

s/Julius W. McKay, II

Julius W. McKay, II

JWM,ii/drd

cc: Christopher W. Nickles, Esquire